

Honorable Thomas S. Zilly

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID A. GOULD; JANE C. POLINDER;
BROOKLINE PROPERTIES, INC.;
WHATCOM COUNTY TREASURER;
TARIO AND ASSOCIATES, P.S.;
WASHINGTON STATE DEPARTMENT OF
SOCIAL AND HEALTH SERVICES;
FINANCIAL CONCEPTS, LTD.;
GOLDSTAR ENTERPRISES, INC.,

Defendants.

Case No. 2:16-cv-1041-TSZ

**REQUEST FOR ENTRY OF
DEFAULT AGAINST DEFENDANTS
TARIO AND ASSOCIATES, P.S., AND
WASHINGTON STATE
DEPARTMENT OF SOCIAL AND
HEALTH SERVICES**

**Note on Motions Calendar:
October 17, 2016**

In accordance with Fed. R. Civ. P. 55(a) and LCR 55(a), the United States of America, through undersigned counsel, requests that the Clerk of the Court enter default against Defendant Tario and Associates, P.S., and against Defendant Washington State Department of Social and Health Services for failing to plead or otherwise defend. The attached Declaration of Charles J. Butler states the basis for this request.

1 Dated: October 17, 2016

Respectfully submitted,

2
3 CAROLINE D. CIRAULO
Principal Deputy Assistant Attorney General

4 /s/ Charles J. Butler
CHARLES J. BUTLER
5 Trial Attorney, Tax Division
U.S. Department of Justice
6 P.O. Box 683
Washington, D.C. 20044
7 202-514-6062 (v)
202-307-0054 (f)
8 Charles.J.Butler@usdoj.gov

9 Of Counsel:
ANNETTE L. HAYES
10 United States Attorney
Western District of Washington

11 Attorneys for the United States of America
12
13
14
15
16
17
18
19
20
21
22
23

CERTIFICATE OF SERVICE

I hereby certify that on October 17, 2016, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will provide electronic notice to counsel of record for all parties that have appeared in this action. In addition, the foregoing was served on the following parties by U.S. mail:

Whatcom County Prosecuting Attorney
311 Grand Avenue
Suite 201
Bellingham, WA 98225

Counsel for Washington State Department of Social and Health Services

Tario and Associates, P.S.
119 N. Commercial St.
#1000
Bellingham, WA 98225

s/ Charles J. Butler
CHARLES J. BUTLER
Trial Attorney, Tax Division
U.S. Department of Justice